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15
16 UNITED STATES DISTRICT COURT
17 SOUTHERN DISTRICT OF CALIFORNIA

18
19 GARY HOFMANN,
20 Plaintiff,
21 v.
22 FIFTH GENERATION, INC., a
23 Texas corporation; and Does 1
through 100, inclusive,
24 Defendants.

25
26 AND RELATED CASE
27
28

Case No.: 14-CV2569-JM-JLB
Related Case No: 14-CV-02990- JM-JLB

**JOINT MOTION FOR ENTRY OF
STIPULATED PROTECTIVE ORDER**

Action filed: Sept. 30, 2014
Removed: October 28, 2014

Trial date: October 31, 2016

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1 Pursuant to Federal Rule of Civil Procedure 26(c), the parties have agreed on
2 the form of a stipulated protective order and jointly move for its entry to govern the
3 exchange of confidential information in this action. The parties respectfully request
4 that the Court grant this Joint Motion and enter the proposed Stipulated Protective
5 Order attached as Exhibit 1 and e-mailed to the chambers of Honorable Magistrate
6 Judge Jill L. Burkhardt (efile_Burkhardt@casd.uscourts.gov) pursuant to § 2 (h) of
7 this Court's Electronic Case Filing Administrative Policies and Procedures Manual.

8
9
10 DATED: August 10, 2015

Respectfully submitted,

11 COOLEY LLP

12 /s/ Michelle C. Doolin

13 Michelle C. Doolin

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18 DATED: August 10, 2015

DEL MAR LAW GROUP, LLP

19 /s/ John H. Donboli

20 John H. Donboli

Attorneys for Plaintiff

21 GARY HOFMANN and all other

22 similarly situated

1 The undersigned hereby certifies that John H. Donboli, who has joined in the
2 filing of this document, has approved of the content of this document and given me
3 consent to file this document with his electronic signature.

4
5
6 /s/Michelle C. Doolin
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Exhibit 1

Pursuant to the request of
Quality Control Clerk's Office
Exhibit 1 has been emailed to
Hon. Jill L. Burkhardt